

Anderson-Cottonwood Irrigation District

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October 23, 2009

Mr. Brad Hubbard
U.S. Bureau of Reclamation
Mid-Pacific Regional Office
2800 Cottage Way
Sacramento, California 95825-1898

Sent via email to bhubbard@usbr.gov

Subject: Comments on 2010 water transfer program

Dear Mr. Hubbard:

Thank you for the opportunity to provide comments to the 2010 water transfer program. During the WebEx meeting on September 23, 2009, it was suggested that river diversions could be used to establish the amount of water made available for transfer through a groundwater substitution program.

For many agricultural districts, including Anderson-Cottonwood Irrigation District, a baseline determined by river diversions would not be an accurate or workable method of calculating water made available by the program.

Our river diversions vary significantly from year to year, and the volume of water diverted each year results in variations that would likely exceed any amount produced by a groundwater substitution program.

Anderson-Cottonwood Irrigation District has plans to construct production wells with an anticipated annual output of 1,800 acre feet each under optimum conditions for extraction. If three such wells were constructed and all the water produced was credited for surface water transfer, the total transfer would be 5,400 acre feet.

The District's annual river diversions regularly vary by 10,000 to 15,000 acre feet. These variations are a result of natural conditions, most importantly spring precipitation. Land use within Anderson-Cottonwood Irrigation District is almost exclusively permanent crops including pasture, alfalfa, and orchards; water demand for such crops is determined to a large extent by precipitation patterns and early summer soil moisture content.

Depending on precipitation patterns and crop water demands, irrigation may begin as early as April 1, or as late as mid-May. The result is a significant variation in year-to-year river diversions, rendering such a method for determination of a baseline of use for transfers infeasible.

Metering water extracted at the wellhead is a much more practical method of measuring water made available for transfer by districts such as ours.

Meters can be calibrated for accuracy at the factory, and installation standards utilized that result in accurate measurement at the wellhead. Mechanical devices can be installed to ensure full discharge pipes, and discharge layouts and straightening vanes will ensure smooth water flow at the meter.

It is important to all of us that supplemental or alternative water supplies be developed and made available; it is equally important that these supplies be quantified accurately and fairly.

Sincerely,

A handwritten signature in blue ink, appearing to read "Stan Wangberg", with a stylized flourish at the end.

Stan Wangberg
General Manager